

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Ernest Adjekum,
Mark Adjekum
Michael Adjekum

(In the space above enter the full name(s) of the plaintiff(s).)

JUDGE CARTER

CV

7430

COMPLAINT

-against-

Citibank

Jury Trial: ☒ Yes ☐ No
(check one)

FILED
U.S. DISTRICT COURT
2014 SEP 12 PM 4:54
S.D. OF N.Y.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Ernest Adjekum, Mark Adjekum, Michael Adjekum
Street Address 1860 Morris Ave. Apt. 1D
County, City Bronx
State & Zip Code New York 10453
Telephone Number 347-726-5841

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Citibank, Legal Services
Street Address 1 Court Square 31st Floor

County, City Long Island City
 State & Zip Code New York, 11120
 Telephone Number 347-507-4828

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)
- ☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

At issue is whether it was constitutional or unconstitutional for Citibank to close plaintiffs account without any reason.

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Citibank, N.A. Fordham Road #102, 2481 Creston Ave. Bronx, N.Y. 10468

B. What date and approximate time did the events giving rise to your claim(s) occur? October 26, 2011

C. Facts: Citibank wrote a letter to close our account without telling us the reason why the account was closed. The letter is enclosed here with.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Intentional infliction of severe emotional distress. On December 31st, 2012, Mr. Ernest Adjekum became unconscious in a car alone for almost three days before the Emergency Medical Services found him. Mr. Adjekum was taken to Montefiore Hospital. After one month and one week at Montefiore Hospital, he was transferred to a Nursing Home on Feb. 7th 2013 and discharged on August 19th 2013. Mr. Adjekum was treated with various Hypertension medications and Physical therapy.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

In December of 2008, Citibank received the Federal bailouts and economic stimulus package approved by congress and was warned to refrain from such a racial discriminatory banking practice. The amount of monetary compensation we are seeking is three hundred Million Dollars. We also want the court to order Citibank to reinstate plaintiff's account if the court doesn't find anything wrong with closing of the account.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12 day of Sept., 2014

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

Markadjean Michael
1860 Morris Ave. APT. 10
Bronx, N.Y.
10453
347-726-5841

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Pro Se Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____

citi

DATE: 01/28/2011

FIMF: 000

EZ CHECKING

ACCOUNT TITLE: ERNEST O ADJEKUM, MARK A ADJEKUM, MICHAEL A ADJEKUM

ADDRESS: 1860 MORRIS AVE APT# 1D BRONX NY 10453
ACCOUNT NUMBER(S): CKC 9980025596/ CSP 9980025641

| NAME / SIGNER | TAX ID NUMBER | ISSUE LINK TO CARD |
|-------------------|---------------|--------------------|
| ERNEST O ADJEKUM | 115-52-7315 | YES |
| MARK A ADJEKUM | 108-70-8863 | YES |
| MICHAEL A ADJEKUM | 108-70-9143 | |

Check appropriate box: ☒ Individual ☐ Other: ☐ Check if Exempt Payee

By signing below, I: (1) certify my tax status; (2) agree to be bound by any agreement governing any account opened in the title indicated on this card.

TAX CERTIFICATION

Under penalties of perjury, I certify that: (1) The number shown on this form is my correct taxpayer identification number, and (2) I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and (3) I am a U.S. citizen, U.S. Resident Alien or other U.S. person (as defined in the instructions).
Certification instruction: You must cross out item (2) above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return.
The Internal Revenue Service does not require your consent to any provision of this Document other than the certifications required to avoid backup withholding.

Signer 1: Ernest O Adjekum



CCS - Client Escalation Unit
100 Citibank Drive
San Antonio, TX 78245-3214

September 26, 2011

Ernest O Adjekum
1860 Morris Ave Apt 1D
Bronx, NY 10453

RE: Notice of account closing - # 112690743398 /eae/Account # XXXXXX5596

Dear Client:

As the focus of our business evolves, we periodically review customer accounts and assess the suitability of those relationships. We are writing to inform you that based on a recent review of your relationship with Citibank, we have determined that we can no longer service your account(s).

Based on this decision, please be advised that Citibank is in the process of closing your account(s), XXXXXX5596, under the terms of the *Client Manual - Consumer Account* or the *Citibusiness Client Manual for Commercial Accounts*.

Please note that, effective on October 26, 2011 your Citibank account(s) is/are restricted from receiving deposits or credits. Please be sure to cancel any automatic or recurring transactions that you may have set up on the above accounts.

As of October 26, 2011, no further transactions of any type will be permitted and we shall regard your account(s) as closed. We suggest that you provide instructions to transfer your funds to another institution prior to this account closing date. If funds remain in your account after this date, and we have determined that no additional returned items against the remaining balance are expected, Citibank will issue you an official check for that balance or balances.

If you require further assistance, please visit your branch or contact Customer Service at 1-877-888-7016. The branch or Customer Service representative will be able to provide instructions to transfer or withdraw your funds from the account(s) or to assist with requesting additional information for you.

Thank you for your prompt cooperation with this request. We sincerely regret any inconvenience you may experience as a result of our closing of your account(s).

Sincerely,

Client Research